

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MICHELLE BEEBE,

Plaintiff,

v.

WILLIAMS COLLEGE,

Defendant.

Civil Action No. 05-30182

**JOINT MOTION TO EXTEND DISCOVERY DEADLINE**

Plaintiff Michelle Beebe (“Plaintiff”) and Defendant Williams College (“Defendant”) hereby jointly move for a one-month extension of the discovery deadline. The discovery deadline currently is set at December 29, 2006 by the Court’s Scheduling Order dated August 4, 2006. The parties request that discovery remain open until January 31, 2007, and that the case management conference, now scheduled for January 10, 2007, be rescheduled to the following month.

As grounds for this motion, the parties state the following:

1. Discovery is actively underway. Defendant propounded interrogatories and document requests in September 2006. Shortly thereafter, Defendant also noticed the depositions of Plaintiff, her doctor as well as her children’s doctor. Two of these depositions are scheduled for early December. In advance of these depositions, Defendant subpoenaed medical records from the offices of these two doctors.
2. Despite this progress on discovery, the parties need additional time. Martha Tetrault, Human Resources Director for the Defendant, is out of the office on short-term medical leave and is expected to return to work in early December 2006. She will be the Defendant’s

designated witness for purposes of a Fed. R. Civ. P. 30(b)(6) deposition as she is the most knowledgeable person employed by Defendant on the issues relevant to this case.

3. Due to Ms. Tetrault's medical leave, the holiday season and planned vacations, the parties need a short one-month extension to complete fact discovery in this case. Since Ms. Tetrault and the other fact witnesses are all in either Williamstown or North Adams, Massachusetts, the parties would like to coordinate the remaining discovery so that it can be done most efficiently.

4. Since both parties assent to and join in this motion, no party is prejudiced by extending the discovery deadline as requested above.

Accordingly, the parties respectfully request that the Court grant their Joint Motion to Extend the Discovery Deadline.

Respectfully submitted,  
Michelle Beebe  
By her attorney,

Respectfully submitted,  
Williams College  
By its attorneys,

/s/ Thomas J. McCormick

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Dated: November 20, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Patricia M. Higgins